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IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION

2005 OCT -6 P 3:47

LORI ANN MORRIS  
DEBRA P. HACKETT, CLERK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT, ALA.  
Plaintiff,

EDWARD NEAL THOMPSON and  
FLORIDA TRANSFORMER,

Defendants.

Civil Action No.

3:05cv962-T

**MOTION TO ALLOW LIMITED DISCOVERY PERTAINING  
TO JURISDICTIONAL ISSUES**

**COMES NOW** Defendant Florida Transformer and hereby moves this Court to permit this Defendant to file limited discovery concerning jurisdictional issues only. In support of said motion, Defendant submits the following:

1. This case was originally filed in state court. Simultaneous to the filing of this motion, Defendant has removed this matter to federal court on the basis of federal question jurisdiction. Specifically, Plaintiff avers in her complaint that Defendant is liable to the Plaintiff based, at least in part, on Defendant's violations of "federal regulations." Plaintiff does not specify exactly what federal regulations have allegedly been violated or how they relate to the issues presented in this lawsuit.

2. Attached hereto is a copy of the proposed discovery, which consists of Request for Admissions and Interrogatories.

3. The granting of Defendant's motion would allow this Court to more fully examine whether the Court does have jurisdiction on the basis of a federal question. In addition, no party will be prejudiced by the Court's allowance of Defendant to file such discovery.

WHEREFORE, premises considered, Defendant respectfully requests that this Court enter an order allowing Defendant to engage in limited discovery for jurisdictional purposes only.



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CERTIFICATE OF SERVICE

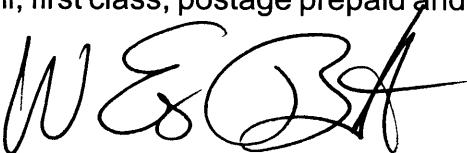
I certify that the foregoing document has been served upon

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by placing copy of same in the United States mail, first class, postage prepaid and properly addressed on this October 6, 2005.

  
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OF COUNSEL